



State of Idaho  
DEPARTMENT OF HEALTH AND WELFARE  
Division of Environmental Quality

1410 N. Hilton  
Boise, Idaho 83706

CECIL D. ANDRUS  
Governor

RICHARD P. DONOVAN  
Attorney General

RECEIVED

MAR 06 1991

March 5, 1991

IDHW-DIV. ENVIRONMENTAL QUAL.  
WATER QUALITY BUREAU

To: Cheryl Grantham, Principal Water Quality Analyst Groundwater Section

From: Michael Gregory, Hazardous Waste Compliance Officer HMB

*ML*  
Early Landing Hazardous Waste Determination

This letter is in response to questions presented to the Hazardous Waste Bureau (HMB) in a memorandum dated January 24, 1991.

According to test results, accompanying the memorandum, the material does not appear to be a Resource Conservation and Recovery Act (RCRA) regulated hazardous waste. Burning of this material in an industrial boiler would be regulated under 40 CFR § 265 Subpart E. This material may be acceptable to be burned in an industrial boiler if prior notification is made to the HMB before the used oil is burned. Analysis of the used oil and an invoice of amounts of burned oil must be kept at the facility for three years.

The data accompanying the memorandum appears adequate to make a waste determination. Sufficient samples were tested for 29 Toxic metals and results were below RCRA regulatory levels. Sufficient samples were tested for VOC, TOX, and pesticides and none were detected. Due to the absence of these constituents it seems unlikely a Toxic Characteristic Leaching Procedure (TCLP) test would indicate other TCLP listed wastes. TPH, FNA, total metals testing was also completed. Levels of constituents indicated in the report are below RCRA regulatory levels.

According to the report, proper sampling and test methods were conducted. Blanks and spike samples were used and the quality of testing appears adequate.

BTU capability of the material may need to be tested. If the boiler's BTU value is insufficient to completely incinerate the constituents present, the boiler may not function properly.

*Celebrate*  
**IDAHO**  
1890-2000  
1890-2000

Printed on Recycled Paper

USEPA SF



1420371

Cheryl Grantham  
March 5, 1991  
Page 2

If the incineration is not complete, metal levels may concentrate in the ash creating a RCRA EP Toxic hazardous waste. Testing of the ash may be needed to determine if residual metals are accumulating.

If you have further questions or comments please contact me at 334-0506.

Bx07/kh